

EXHIBIT 2

Excerpts from the Deposition Transcript of
Marian Noronha

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE
Civil Action No. 1:23-cv-00523-LM-AJ

- - - - - x
LILLIAN BERNIER, :
Plaintiff, :
v. :
TURBOCAM, INC., :
Defendant. :
- - - - - x

DEPOSITION OF MARIAN NORONHA

Tuesday, April 15, 2025
10:02 a.m.

HOMEWOOD SUITES
1000 Perimeter Road
Manchester, New Hampshire 03103

Stenographically Reported By:
DEANNA J. DEAN, LCR, RDR, CRR

Transcript of Marian Noronha
Conducted on April 15, 2025

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1 Q. Who is responsible for preparing the
2 proposal that you say yes or no to with respect to
3 health benefits?

4 A. Pete Hanson, assisted by Darika.

5 Q. And when you say "Darika," do you mean
6 Darika Marino?

7 A. Yes.

8 Q. When was Turbocam Inc. founded?

9 A. Approximately April 1987.

10 Q. And currently -- let's take the last five
11 years -- what business is Turbocam Inc. in?

12 A. Manufacturing of flow path components.
13 F-l-o-w, p-a-t-h, c-o-m-p-o-n-e-n-t-s.

14 Q. What are flow path components?

15 A. I thought you'd ask. That's why I spelled
16 it out for you.

17 There are many piece of machinery where
18 air or fluids flow through a system. We make the
19 parts where the flow passes through.

20 Q. Who are those parts sold to? What kind of
21 customers or clients do you sell flow path
22 components to?

23 A. Aerospace. Turbo machinery. That's the
24 two major categories.

25 Q. Do you know whether the plaintiff in this

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1 case, Lillian Bernier's, job is involved in the
2 manufacture of flow path components?

3 A. Yes and no. Because that is the general
4 end product, the answer's yes. But he is not a
5 machinist. He is an operator of machinery.

6 Q. So it's the machine that makes the
7 product?

8 A. Correct.

9 Q. And Lillian Bernier operates one of the
10 machines that's involved in making flow path
11 components?

12 A. He is an operator on one of the
13 machines -- I'd say one or more -- of the milling
14 machines only.

15 Q. Can you give me just a -- some examples of
16 actual companies who purchase flow path components
17 from Turbocam, just so I can kind of understand
18 your customer base?

19 ATTORNEY MINICH: Objection.

20 Are you referring to by name of customers?

21 ATTORNEY KLEIN: Yeah.

22 ATTORNEY MINICH: Objection.

23 A. I don't think I should give that to you.
24 That's a customer list, which is confidential.

25 ATTORNEY KLEIN: Bethany, are you

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1 A. Daikin, D-a-i-k-i-n. Danfoss,
2 D-a-n-f-o-s-s.

3 Is that adequate?

4 Q. Sure.

5 What business is Cummins Inc. in?

6 A. They make engines.

7 Q. Okay. And what business is Daikin in?

8 A. Say again?

9 Oh, Daikin. Air conditioning.

10 Q. Okay. And what about Danfoss?

11 A. Also air conditioning.

12 Q. What are Turbocam Inc.'s annual revenues,
13 if you can give me the range for the past five
14 years?

15 ATTORNEY MINICH: Objection.

16 A. Actually, Bernier already has information
17 on this because we present it openly.

18 ATTORNEY MINICH: So to the extent you
19 know, you've got to answer.

20 A. Right. It's between, in the last five
21 years, 100 to 150 million.

22 Q. Did Turbocam Inc. operate in -- well,
23 where is Turbocam Inc. located?

24 A. In Barrington, New Hampshire.

25 Q. Does Turbocam Inc. have any other

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1 locations?

2 A. Charleston, South Carolina. Chandler,
3 Arizona. Dover, New Hampshire.

4 No. Actually, it's not in Dover, New
5 Hampshire. I gave the name of Dover, New
6 Hampshire, and it's not in Dover, New Hampshire.

7 Q. Does Turbocam Inc. have any other
8 locations that you haven't indicated yet?

9 A. No.

10 Q. How many employees does Turbocam Inc.
11 have?

12 A. Approximately 600.

13 Q. Are all of those 600 employees located in
14 the United States, then?

15 A. Yes.

16 Q. Okay. Does Turbocam Inc. receive any
17 federal funding?

18 A. No.

19 Q. Have you ever had a contract with the
20 federal government?

21 A. Not directly.

22 Q. Okay. Have you had a contract -- have you
23 had a contract with the federal government
24 indirectly, as you've described?

25 A. Yes.

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1 A. Yes.

2 Q. Okay. And you signed the document on
3 behalf of Turbocam. Is that correct?

4 A. Yes.

5 Q. Now, if you look at -- it's not paginated,
6 but after the signature and certificate of service,
7 there's an ownership chart.

8 Do you see that document?

9 A. Yes.

10 Q. The document indicates a corporate entity
11 called Turbocam Automated Production Systems?

12 A. Yes.

13 Q. What is that corporation?

14 A. That is the corporation in which Bernier
15 works. His paycheck comes from Turbocam Inc.

16 You're confused.

17 Q. Well, I'm getting ready to ask you a
18 question.

19 A. Okay.

20 Q. So Turbocam Inc. is Bernier's employer.
21 Is that correct?

22 A. Off record, correct.

23 Q. All right. What is the relationship
24 between Turbocam Inc. and Turbocam Automated
25 Production Systems?

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1 A. Scratch that.

2 I am the owner -- I'm not sure if I'm
3 saying it technically correct. I believe I am the
4 owner of a trust which owns the 200 voting shares
5 of Turbocam Inc.

6 Q. Okay.

7 A. And my wife owns the trust that contains
8 9800 nonvoting shares of Turbocam Inc.

9 Q. Are you also an officer of Turbocam Inc.?

10 A. Yes.

11 Q. And what offices do you hold?

12 A. President.

13 Q. Are you also a board member?

14 A. I'm a director.

15 Q. Now, I think you've said a little bit in
16 your declaration that you were educated in India.
17 Is that correct?

18 A. Yes.

19 Q. And what education did you receive in
20 India?

21 A. Can you be more specific?

22 Q. Did you attend college in India?

23 A. Yes.

24 Q. All right. And what college?

25 A. St. Xavier's College in Bombay.

1 other Turbocam employees?

2 A. It's a good technical question. 10,000
3 minus 1 is 9999, which is a reduction from 10,000.

4 Q. All right. So you believe that ordering
5 diabetes medications for one employee reduced
6 everybody else's healthcare cost?

7 A. Yes, and I made it -- I made it available
8 to all employees. In a public setting, I showed
9 the difference in cost.

10 Q. Okay. And what was the difference in cost
11 to Lillian Bernier --

12 A. Oh.

13 Q. Okay?

14 -- as a result of your ordering diabetes
15 medications for one employee last year?

16 A. I have no idea of where Lillian Bernier
17 buys his medicines. I have no idea of where he
18 gets his insurance. I do not know if he's covered
19 by our plan.

20 Q. What is the evidence -- well, strike that.

21 How much -- give me a dollar amount -- did
22 your buying diabetes medication for one person last
23 year reduce the standard contribution for a single
24 plan of a Turbocam employee?

25 A. My contribution was in the range of \$6,000

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1 A. I don't know.

2 Q. Are you aware that Lillian Bernier, the
3 plaintiff in this case, is a transgender woman?

4 A. I don't know.

5 Q. You don't know if Lillian Bernier is a
6 transgender woman?

7 A. Correct.

8 Q. Okay. Why do you refer to Lillian Bernier
9 using male pronouns?

10 A. The person called Lillian Bernier was
11 Robert Bernier when I talked to him last, and I
12 have not talked to him since. I know that he has
13 changed his name.

14 Q. If I told you here today that Lillian
15 Bernier is a transgender woman who uses female
16 pronouns, would you refer to Lillian Bernier using
17 female pronouns?

18 ATTORNEY MINICH: Objection.

19 A. I will use the word "Bernier."

20 Q. Why would you use the word "Bernier"?

21 A. Because that is the name of the employee.

22 Q. Do you typically refer to employees by
23 their last name?

24 A. Sometimes.

25 Q. All right. Are there employees who you

1 A. Yes.

2 Q. All right. And what was that occasion?

3 A. His interview.

4 Q. Okay. And was that the only occasion?

5 A. He spoke to me on another occasion, but I
6 did not speak to him.

7 Q. And when was that?

8 A. It's between the third week of January and
9 the second week of February of 2021.

10 Q. And what were the circumstances of that
11 interaction?

12 A. I was sitting down. He came and I thought
13 he had -- he was kneeling next to me on one knee.
14 It was at a company meeting. That's why I know the
15 dates. And he said, "I'm completely in support of
16 what you are doing."

17 Q. Who do you believe this person was?

18 A. At that time, Robert Bernier.

19 Q. And what did you take "I'm completely in
20 support of what you are doing" to mean?

21 A. I do not know.

22 Q. Was that the only thing?

23 A. Can you repeat your question.

24 Q. My question was, what did you understand,
25 or did you have any understanding of what was meant

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1 men.

2 Q. And you do not regard Lillian Bernier as a
3 woman. Is that correct?

4 A. Correct.

5 Q. All right. And so why is it dependent
6 upon whether other people objected?

7 A. Because it is a private space for women.
8 If other women object, then he should not be in
9 that space.

10 Q. Would it violate your religious beliefs if
11 the personnel staff at your company, Turbocam Inc.,
12 had affirmatively made a decision that Lillian
13 Bernier could use the woman's -- the women's rest
14 room?

15 ATTORNEY MINICH: Objection.

16 When you say "personnel staff," are you
17 referring to the human resources department?

18 ATTORNEY KLEIN: Yes.

19 THE WITNESS: We don't call it "human
20 resources" in the company.

21 Q. You understand what I mean. Right?
22 Talent development?

23 What do you call it?

24 A. Personnel.

25 Q. Personnel. Okay. So let me ask the

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1 A. The question -- my answer has been if the
2 women who are meant to use that room are
3 inconvenienced, then I would object.

4 Q. Is it your position that Lillian Bernier
5 is not a person who is meant to use the women's
6 room?

7 ATTORNEY MINICH: Objection.

8 A. Lillian Bernier is not a woman, and that
9 place is meant as a private place for women.

10 Q. And your statement that Lillian Bernier is
11 not a woman is based on your religious beliefs.
12 Correct?

13 A. Correct.

14 Q. But it would only violate your
15 religious -- well, strike that.

16 It would only violate your religious
17 beliefs for Lillian Bernier to use the women's room
18 if another employee objected. Am I understanding
19 you correctly?

20 A. If another woman who is entitled to use
21 that space is inconvenienced.

22 Q. And under those circumstances, Lillian
23 Bernier's using the women's room would violate your
24 religious beliefs?

25 ATTORNEY MINICH: Objection.

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1 Q. Does marriage between two people of the
2 same sex violate your religious convictions as
3 expressed in and informed by the Bible?

4 A. Yes.

5 Q. Does divorce violate your religious
6 convictions as expressed in and informed by the
7 Bible?

8 A. Yes.

9 Q. Does sex prior to marriage violate your
10 religious convictions as expressed in and informed
11 by the Bible?

12 A. Yes.

13 Q. Does sex outside of the marital
14 relationship violate your religious convictions as
15 expressed in and informed by the Bible?

16 A. Yes.

17 Q. Does sex between two men violate your
18 religious convictions as expressed in and informed
19 by the Bible?

20 A. Yes.

21 Q. I'm sorry?

22 A. Yes. Yes. I thought you asked that
23 question before.

24 Q. Actually, the question before -- so let's
25 be clear, is -- the question before, unless I

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1 HSA PPO plan, which is Bates stamp numbers 0001 to
2 0130 of documents produced to us by your counsel.

3 Do you recognize this document?

4 A. No.

5 Q. Okay. Are you aware that Turbocam has a
6 self-funded employer health benefit plan?

7 A. Yes.

8 Q. Okay. Do you have any reason to doubt
9 that this is what has been produced to us by your
10 lawyers is the Turbocam self-funded health benefits
11 plan?

12 A. Unless you snuck it out there and
13 kidnapped somebody, no.

14 Q. Okay.

15 Is it important to you that the health
16 coverage permitted by Turbocam self-funded employer
17 health benefits plan is consistent with your
18 religious convictions as expressed in and informed
19 by the Bible?

20 A. Thank you. Yes.

21 Q. Now, can you please take a look at page 7
22 of the plan, which is Bates No. 0027.

23 Do you see on page 7 -- well, let me see.
24 There's a definition of "eligible dependent"?

25 A. Yes.

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1 Q. All right. And do you see that under
2 "eligible dependent," one of the eligible
3 dependents under the plan is an employee spouse?
4 Is that correct?

5 A. Yes.

6 Q. Can you please read the two paragraphs --
7 strike that.

8 Can you please read the definition of an
9 employee spouse on page 7 of the Turbocam
10 self-funded health benefits plan.

11 A. Do you want me to read aloud?

12 Q. To yourself. To yourself.

13 A. Okay.

14 Q. And let me know when you've finished.

15 A. Both paragraphs?

16 Q. The full number 1, employee spouse.

17 A. [Reviewing document.]

18 Okay.

19 Q. All right.

20 A. I've never read this before.

21 Q. Okay. Is it your understanding that
22 Turbocam offers health benefits not just to the
23 employee but also to the employee's spouse?

24 A. Yes.

25 Q. All right. Does Turbocam offer spousal

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1 health insurance benefits under its plan to the
2 same sex spouse of an employee?

3 A. I don't know.

4 Q. Okay. Would offering health insurance to
5 the spouse of an employee who is in a same-sex
6 marriage violate your religious beliefs?

7 A. Can you state your question again?

8 Q. Yes.

9 Would offering spousal health insurance to
10 the -- to an employee and the employee's spouse who
11 are in a same-sex marriage violate your religious
12 beliefs?

13 A. It's a case of it would violate my -- my
14 religious beliefs, but it might be a state law.
15 And I don't know how we have handled it in the
16 past, and I don't know if we have any such cases in
17 the company.

18 Q. Okay. Well, let me ask you first, putting
19 aside any state law, does providing health
20 insurance benefits to an employee and their
21 same-sex spouse by virtue of being in a same-sex
22 marriage violate your religious beliefs?

23 A. Yes.

24 Q. Okay. Now, you indicated -- I think in
25 your answer you said it might violate your

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1 religious beliefs, but there might be a state law,
2 or might be a law that requires that.

3 Is that your understanding?

4 A. Yes. Yes.

5 Q. All right. And if the law -- well --

6 A. Take the time. It's okay.

7 Q. Thank you. I certainly try to.

8 If there were a law that required an
9 employer like Turbocam to provide same-sex spousal
10 health insurance benefits, that would violate your
11 religious beliefs as well. Correct?

12 A. Yes.

13 Q. All right. Would you comply with the law?

14 A. I might shut down the company.

15 Q. Okay. So you would shut down the company
16 before you would provide same-sex spousal health
17 insurance benefits?

18 ATTORNEY MINICH: Objection.

19 A. Again -- again, I need to know the
20 context, the state, the country, the exact law, to
21 see if the mission can be upheld in that state, in
22 that country, before I make the decision.

23 But I created a company and wrote the
24 mission to state why we exist as a company: to
25 honor God, create wealth for our employees, and

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1 this.

2 Q. Okay. If I can -- oh, I just lost my
3 page.

4 Okay. Could you please look at page 24 of
5 the handbook, which is Bates 0044. Do you see in
6 the column on the left that Turbocam covers and
7 pays for stem cell transplants?

8 Do you see that?

9 A. Yes.

10 Q. Does covering and paying for stem cell
11 transplants violate your religious convictions as
12 expressed in and informed by the Bible?

13 A. No.

14 Q. And why is that?

15 A. It's part of the process of healing.

16 Q. Part of the process of healing?

17 A. Healing.

18 Q. Okay.

19 Now, you are aware, are you not, that a
20 stem cell transplant involves harvesting embryonic
21 stem cells from an early-stage embryo, requiring
22 the destruction of that embryo?

23 ATTORNEY MINICH: Objection.

24 A. Not all stem cells.

25 Q. Okay.

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1 A. Not all stem cells.

2 Q. Okay.

3 A. Only some.

4 Q. Is there anything in Turbocam's health
5 plan that limits the type of stem cell transplant
6 that's covered?

7 A. Frankly, I haven't read this book before.
8 I haven't seen this book before. I'm not familiar
9 with what's in this book. I endeavor to spend
10 under one hour a year on medical insurance.

11 Q. I understand. But --

12 A. It would -- it would depend on the
13 people -- now, I only know two people who have gone
14 through this treatment, and both of them are very
15 mature people who I would trust their judgment on
16 it.

17 Q. When you say "very mature," do you mean --
18 what do you mean?

19 A. They're grown-ups. They're mature in
20 their thinking. And they have spent -- they both
21 spent something like seven months in isolation as
22 part of a stem cell treatment. I have no doubt
23 that both of them would have rejected the killing
24 of an embryonic -- a fetus to save their lives.

25 Q. I'm sorry. Would have what?

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1 A. I'm convinced -- I know both these people
2 would have objected to using embryonic stem cells.
3 I even put this into the category of -- okay.
4 Nothing more to add.

5 Q. Okay. Were those people employee -- the
6 people that you talked about who had stem cell
7 transplants, were those Turbocam employees?

8 A. One was.

9 Q. All right. And when was that transplant?

10 A. 2008.

11 Q. 2008.

12 So that was not part of Turbocam's
13 self-funded health benefits plan?

14 A. No. No.

15 Q. And the other person was not a Turbocam
16 employee?

17 A. Correct.

18 Q. All right. Now, if, in fact, Turbocam
19 covered stem cell transplants that were of the type
20 that resulted in the destruction of an embryo,
21 would that violate your religious convictions as
22 expressed in and informed by the Bible?

23 A. Yes.

24 Q. Okay.

25 Does in vitro fertilization, IVF, violate

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1 your religious convictions as expressed in and
2 informed by the Bible?

3 A. No.

4 Q. And why not?

5 A. It does not kill a zygote.

6 Q. Are you aware that in vitro fertilization
7 necessarily involves the creation of multiple
8 embryos of which few are implanted and many are
9 discarded?

10 ATTORNEY MINICH: Objection.

11 A. Yes.

12 Q. All right. And would the process of
13 creating an embryo and discarding it violate your
14 religious beliefs?

15 A. Yes.

16 You need to deliver the punch line now.
17 Go ahead.

18 Q. Well, my question to you, right, as you
19 probably know, is, if, in fact, Turbocam was paying
20 for in vitro fertilization process which resulted
21 in the destruction --

22 A. Yes.

23 Q. -- of embryos, why does that not violate
24 your religious beliefs?

25 ATTORNEY MINICH: Objection.

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1 A. It's a good question. I haven't settled
2 that question.

3 Q. You haven't settled that question?

4 A. Yeah.

5 Q. Okay. But you agree that IVF results in
6 the destruction --

7 A. Yes.

8 Q. -- of embryos?

9 A. Yes. That's why I told you to deliver the
10 punch line.

11 Q. And if I --

12 A. It is an ethical issue that has not been
13 resolved. I believe the Catholic church has banned
14 it.

15 Q. Well, I'm asking you about your beliefs.

16 A. I haven't settled it.

17 Q. Okay.

18 A. It also depends on -- so it is still
19 hypothetical. This is still a hypothetical
20 question, that you are asking the question.

21 Q. Well, what factors might it depend on?

22 A. The number, if there are spare embryos
23 created.

24 Q. Okay. And assume there are.

25 ATTORNEY MINICH: Objection.

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1 A. That's an assumption.

2 Q. Well, do you agree that in vitro
3 fertilization results in the destruction of some
4 embryos?

5 ATTORNEY MINICH: Objection.

6 A. No.

7 Q. Okay. Do you agree --

8 A. It could -- I think if you said "may."

9 Q. All right.

10 So if, in fact, there were an in vitro
11 fertilization procedure that did, in fact, result
12 in the destruction of some embryos --

13 A. That did not, you said.

14 That did or did not?

15 Q. That did.

16 A. That did.

17 Q. Let me rephrase the question.

18 A. Okay.

19 Q. If, in fact, Turbocam covered and paid for
20 an in vitro fertilization procedure that resulted
21 in the destruction of some embryos, would that
22 violate your religious beliefs?

23 ATTORNEY MINICH: Objection.

24 A. I'll have to think about it.

25 Q. What factors would be important in

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1 Q. Any other jobs?

2 A. I'd have to think about it.

3 Q. Do you know what Lillian Bernier's job is
4 at Turbocam?

5 A. He is an operator.

6 Q. And when you say "he," why are you saying
7 "he"?

8 A. Okay. Bernier is an operator.

9 Q. Okay. And would that job involve any
10 fumes at any time?

11 A. Don't think so. There are men and women
12 who do the job.

13 Q. Now, in paragraph 14 of your affidavit,
14 which is Exhibit 2, you also say, We hold to
15 traditional teachings -- traditional Biblical
16 teachings about sexual expression.

17 Do you see that?

18 A. Yes.

19 Q. Have any teachings about sexual
20 expression, Biblical teachings about sexual
21 expression, informed the way you run Turbocam?

22 A. I'd have to think about that one.

23 Q. Okay. Can you tell me, in that paragraph,
24 in that sentence I just quoted, where you used the
25 term "sexual expression" in paragraph 14 of your

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1 Q. I'm sorry. What?

2 A. "You ought to know about this."

3 Q. I'm asking you these questions.

4 A. No. This is what I was told: "You ought
5 to know about this."

6 Q. Oh, I see. I understand. Getting a
7 little tired. Okay.

8 And who told you this?

9 A. Pete Hanson.

10 Q. Did you ever have any conversation with
11 Julie Oakley about Lillian Bernier?

12 A. No.

13 Q. So when Pete Hanson spoke to you, what did
14 he say and what did he explain to you?

15 A. He said that a woman -- there was a guy
16 who wanted to change his name.

17 Q. Did Pete say what the person wanted to
18 change their name to?

19 A. Yes. I didn't remember it at the time.

20 Q. But he explained to you --

21 A. I just didn't know who the person was.

22 Q. Okay. And based on your conversation with
23 Pete, did you have an understanding of why he was
24 telling you this?

25 A. He was in denial. Bernier was in denial.

1 what happened in those days.

2 Q. Okay.

3 After that first discussion with Pete
4 Hanson that you just described, did you -- did
5 anybody else bring anything else to your attention
6 at any time with respect to the employee Lillian
7 Bernier?

8 A. No.

9 ATTORNEY MINICH: Objection.

10 Q. Not to this day?

11 A. Oh. No. You asked at that time.

12 Q. Okay. Subsequent to that conversation,
13 when was the next time somebody at Turbocam brought
14 a matter to your attention related to Lillian
15 Bernier?

16 A. I think October '22.

17 ATTORNEY KLEIN: Can I get this marked as
18 Exhibit 3.

19 This is document 1274.

20 ATTORNEY MINICH: Is it 3 or 4?

21 ATTORNEY KLEIN: Oh, sorry. It's 4.

22 (Noronha Exhibit 4 is marked for
23 identification.)

24 Q. Mr. Noronha, I'm showing you what has been
25 marked as Exhibit 4, which is an email to several

1 people, including you, dated April 13, 2022. And
2 it says, from Pete, "I would like to connect our
3 current medical plans in relation to coverage to
4 gender transition and/or gender dysphoria."

5 Do you recall attending the meeting that
6 was requested in this email?

7 A. I don't.

8 Q. You have no recollection of this meeting?

9 A. No.

10 Q. Okay. Now, did could you please look
11 at --

12 ATTORNEY KLEIN: Actually, could we take
13 like a 3- to 5-minute break?

14 ATTORNEY MINICH: Sure.

15 (Recess taken from 2:51 p.m.

16 to 3:00 p.m.)

17 BY ATTORNEY KLEIN:

18 Q. Back on the record.

19 One thing I just want to go back to
20 something that we were talking about at the very
21 beginning of the deposition around Turbocam
22 switching to a self-funded health benefits plan.

23 A. Mm-hmm.

24 Q. What -- do you have an understanding of
25 what a self-funded employer health benefits plan

1 to say I would have been quite clear that we are
2 going to take it out. We're not going to put it
3 back in.

4 Q. Okay. So is it accurate to say that you
5 have an objection to covering treatment of gender
6 dysphoria such as gender reassignment surgery and
7 hormone therapy in your -- in Turbocam's
8 self-funded health benefits plan?

9 ATTORNEY MINICH: Objection.
10 You can answer.

11 A. Can you reframe the question?

12 Q. Yeah.

13 Is it accurate to say that you have an
14 objection to covering medical treatment for gender
15 dysphoria such as gender reassignment surgery or
16 hormone therapy in Turbocam's self-funded health
17 benefits plan?

18 ATTORNEY MINICH: Objection.

19 A. Yes.

20 Q. Okay. Can I draw your attention again to
21 your affidavit or your declaration, which is
22 Exhibit 2, and to paragraph 14, which says -- well,
23 in paragraph 12, it says, "According to the
24 American Psychological Association, the
25 psychological condition known as 'gender dysphoria'

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1 is a distressing discordance between a person's
2 biological sex and sense of 'gender identity.'"

3 Do you see that paragraph in your
4 affidavit?

5 A. Mm-hmm.

6 Q. Did you write that?

7 A. No. Someone else wrote it. I agreed with
8 it.

9 Q. Okay. In the next sentence, you note,
10 "Turbocam's health plan contains an exclusion that
11 precludes coverage for 'gender dysphoria treatment,
12 including but not limited to counseling, gender
13 reassignment surgery, or hormone therapy and
14 related preoperative and postoperative procedures
15 which, as their objective, change the person's sex
16 and any related complications.'"

17 Do you see that in paragraph 13?

18 A. Yes.

19 Q. At the time that you prepared your
20 affidavit, were you aware of the exclusion of
21 gender dysphoria treatment in Turbocam's health
22 plan?

23 A. Yes.

24 Q. Okay. And then in the next paragraph,
25 paragraph 14, you say, "Suzie's and my Christian

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1 faith and religious convictions preclude us from
2 providing these interventions in Turbocam's health
3 plan."

4 A. Mm-hmm.

5 Q. Does paragraph 14 reflect the reasons that
6 you object to covering treatment of gender
7 dysphoria in Turbocam's health plan?

8 A. Yes.

9 Q. Can you read paragraph 14 of your
10 affidavit in its entirety and let me know when
11 you've finished reading it.

12 ATTORNEY MINICH: You can read it to
13 yourself and just let him know when you're done.

14 A. Yes.

15 Q. Is paragraph 14 a complete and accurate
16 statement of the reason that Turbocam objects to
17 providing treatment for gender dysphoria in its
18 health plan?

19 ATTORNEY MINICH: Objection.

20 A. I could write another book on it.

21 Q. I'm asking you to answer my question.

22 A. Yes. Your question is it entirety, and my
23 answer that I could write another book on it. In
24 other words, I could write much more about it.

25 Q. About the religious basis --

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1 A. Yes.

2 Q. -- for not covering gender dysphoria?

3 A. Yes.

4 Q. Okay. What more would you say?

5 A. I'd have to think about it. I'm not going
6 to write a book without thinking.

7 Q. Okay.

8 A. But there's a lot more to be said about
9 it.

10 Q. About the religious basis for excluding
11 the treatment --

12 A. Yes.

13 Q. -- of gender dysphoria?

14 A. Yes. Yes.

15 Q. Okay.

16 A. On the subject on gender, on the subject
17 of exactly what it says here: Man created -- "God
18 created man in his own image, male and female,
19 equal in dignity and value. We believe that these
20 together these" -- "that we believe that, together,
21 these two ... immutable and complementary sexes
22 reflect the image, nature, and glory of God."

23 That's about two chapters' worth.

24 Q. Okay.

25 A. That's a very concise statement. It could

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1 be expanded exceedingly. So if you ask me is this
2 all that is to be said, no, it's not all that is to
3 be said.

4 Q. Okay.

5 It's correct -- is it accurate to say,
6 though, that Turbocam objects to --

7 A. Yes.

8 Finish your sentence.

9 ATTORNEY MINICH: Wait.

10 Q. Is it accurate to say that Turbocam
11 objects to providing treatment for gender dysphoria
12 in its health plan because it violates the
13 religious convictions of you and your wife, and is
14 contrary to the teachings of the Bible?

15 A. Including the last part of the sentence:
16 "Which, as their objective, change a person's sex
17 and any related complications."

18 Q. Yeah. But my question is the reason --
19 the reason that Turbocam objects to treating --
20 providing coverage for gender dysphoria treatment
21 or any medical treatment that, as the exclusion
22 puts it, "change the person's sex and any related
23 complications," is due to the religious beliefs of
24 you and your wife?

25 A. Thank you. Yes.

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1 A. A lot of what you described you used the
2 word "health," and I object to be -- to the use of
3 the word "health." I will not use the word
4 "health" in all of these, what you call treatments
5 for gender dysphoria.

6 So if it is for health purposes, I support
7 it. For what amounts to plastic surgery and which
8 I don't believe is health, I would object to it.

9 Q. Okay.

10 Prior to learning about Lillian Bernier,
11 have you ever heard the term "gender dysphoria" as
12 a medical diagnosis?

13 A. I heard of it.

14 Q. What did you understand -- well, strike
15 that.

16 At the time that you learned that Lillian
17 Bernier -- well, sorry. It's getting too late in
18 the day.

19 Did you understand at some point in time
20 that Lillian Bernier had been diagnosed with gender
21 dysphoria?

22 ATTORNEY MINICH: Objection.

23 A. Bernier made a claim to that extent.

24 Q. Okay. At the time that you learned that
25 Bernier indicated she had been diagnosed with